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April 15, 2008

VIA ECF

Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1310
New York, New York 10007

Melvin M. Wright, Jr.
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Re: *Soul Circus, Inc. v. Trevanna Entertainment, LLC and The Apollo Theater Foundation, Inc*
Case No: 07 CV 10597 (LAK)
Request for Extension of Time to Disclose Experts

Dear Judge Kaplan:

This afternoon, Baker Botts L.L.P. entered an appearance on behalf of Plaintiff Soul Circus, Inc. as local counsel in the above-referenced action. Subsequent to filing its notice of appearance, counsel learned that today is the date by which Plaintiff is required to disclose its experts pursuant to Fed. R. Civ. P. 26(a)(2).

Due to its late appearance in this action, counsel was unaware of this scheduling deadline and now requests a five business day extension for Plaintiff to disclose its testifying experts in this matter on the issues of consumer confusion surveys, linguistics, damages and other similar topics. If this extension is granted, Plaintiff would disclose its experts on or before April 22, 2008.

We attempted but were unable to reach counsel for the Defendants to obtain their consent to an extension. This is the first of such requests for an extension by Plaintiff.

Respectfully submitted,

/s/ Melvin M. Wright, Jr.
Melvin M. Wright, Jr.

MMW

cc: Kerry L. Konrad, Esq.
Lawrence W. Rader, Esq.
R. Delacy Peters, Jr., Esq.
T. Andrew Brown, Esq.